

EXHIBIT H

Renee Beckham

February 13, 2025

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

FOOD NOT BOMBS HOUSTON	§	
ET AL.,	§	
	§	
Plaintiffs,	§	Case No. 4:24-cv-338
	§	
v.	§	(Consolidated Case: No.
	§	4:23-cv-1206)
CITY OF HOUSTON, TEXAS,	§	
	§	
Defendant.	§	

ORAL DEPOSITION OF

RENEE BECKHAM

FEBRUARY 13, 2025

ORAL DEPOSITION OF RENEE BECKHAM, produced as a witness at the instance of the Plaintiffs and duly sworn, was taken in the above styled and numbered cause on Thursday, February 13, 2025, from 9:10 a.m. to 2:49 p.m., before DONNA QUALLS, Notary Public in and for the State of Texas, Notary ID No. 12161359, reported by computerized stenotype machine, at the offices of Houston City Hall Annex, 900 Bagby Street, 4th Floor, Houston, Texas, pursuant to the Federal Rules of Civil Procedure, and any provisions stated on the record or attached hereto.

A P P E A R A N C E S

FOR THE PLAINTIFF, FOOD NOT BOMBS AND BRANDON WALSH:

RANDALL HIROSHIGE

CHRISTINA BEELER

TEXAS CIVIL RIGHTS PROJECT

1405 Montopolis

Austin, Texas 78741

(512) 474-5073

randy@texascivilrightsproject.org

christinab@texascivilrightsproject.org

FOR THE PLAINTIFF, PHILLIP PICONE:

RANDALL L. KALLINEN

KALLINEN LAW FIRM

511 Broadway Street

Houston, Texas 77012

(713) 320-3785

attorneykallinen@aol.com

FOR THE DEFENDANT, CITY OF HOUSTON:

LUCILLE ANDERSON

KENNETH S. SOH

CITY OF HOUSTON LEGAL DEPARTMENT

P.O. Box 368

Houston, Texas 77001-0368

(832) 393-6491

mlucille.anderson@houstontx.gov

kenneth.soh@houstontx.gov

Also Present:

Natoya Inglis

Anamaria Kheveli

Rihika Kumar

Renee Beckham

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<p style="text-align: right;">Page 154</p> <p>1 A. One ongoing. I think I mentioned Loaves & 2 Fishes earlier. 3 Q. Okay. 4 A. In their -- I guess in their patio, we got a 5 complaint. The weekend inspector went out there, and 6 they were -- the organization -- I don't remember the 7 name of the organization. They weren't feeding them in 8 accordance with food safety. So there was issues with 9 the manner of which the food was being provided or 10 uncovered food. So you're serving buffet style, and you 11 have food just totally exposed. 12 Q. And when you -- so was it -- do you know if 13 Loaves & Fishes authorizes other groups to provide 14 charitable feedings on their patio? 15 A. This was the first that I had heard -- 16 Q. Okay. 17 A. -- that they even had charitable feeding on 18 their property because they have a kitchen. But I think 19 on Sundays or Sunday mornings they don't feed. So 20 that's probably why they do that. 21 Q. And Loaves & Fishes itself provides meals to 22 homeless people during the week, right? 23 A. Yes. 24 Q. But it provides those meals on their own 25 property?</p>	<p style="text-align: right;">Page 156</p> <p>1 illegal food establishment. So I would have to go 2 through the database and look by the address whether 3 they're referring to someone feeding the homeless or 4 not. See what I'm saying? 5 Q. Okay. So -- but aside from the three 6 complaints -- the 2018, the 2020 -- the 2018 across the 7 street from Loaves & Fishes, 2020 outside the Central 8 Library, and the current issue at Loaves & Fishes -- are 9 you aware or have you seen any other food safety 10 complaints arising out of charitable feeding? 11 A. No. Just those that, like I say, that I'm 12 aware of. 13 Q. Okay. Now, do employees from the health 14 department regularly attend feedings at 61 Riesner? 15 A. No, they don't. It's not a regular, routine 16 site that they would visit. 17 Q. Okay. And earlier you mentioned that you 18 maintain a calendar of the groups and individuals who 19 are feeding at 61 Riesner; is that right? 20 A. Yes. 21 Q. And do people have to schedule a charitable 22 feeding on the calendar to feed there, or can they just 23 show up and provide food? 24 A. They could just show up. 25 Q. Okay.</p>
<p style="text-align: right;">Page 155</p> <p>1 A. Right. 2 Q. So it's not covered by the ordinance? 3 A. It's covered by Chapter 20, yes, because it's a 4 permitted kitchen. 5 Q. Okay. 6 A. Right. 7 Q. But it's not covered by the charitable feeding 8 ordinance because they're doing the feeding on their own 9 property? 10 A. Right. 11 Q. Okay. Now -- okay. So now we have three. 12 There's the 2018 complaint across the street from 13 Loaves & Fishes, the 2020 complaint outside the Central 14 Library -- 15 A. Right. 16 Q. -- and then the ongoing complaint about another 17 group serving feed in Loaves & Fishes' patio. 18 A. Yes. 19 Q. Aside from those complaints, are there any 20 other current complaints about the food safety or 21 sanitation for charitable feeding? 22 A. There could be. And the reason I'm saying this 23 is because they're going to be listed, it depends on how 24 the person describes the complaint to us. So anyone 25 that doesn't have a permit, we're going to call it an</p>	<p style="text-align: right;">Page 157</p> <p>1 A. Yeah, I would say, yes, they can just show up. 2 Q. Okay. So it's an optional step to get in 3 contact with the health department to schedule it and 4 put it on the calendar? 5 A. Right. 6 Q. Okay. I'm going to hand you what I've marked 7 as Exhibit 46. 8 (Exhibit No. 46 was marked.) 9 Q. (BY MR. HIROSHIGE) Take a moment to review 10 these pages. 11 A. (Witness complies.) 12 Okay. 13 Q. And so this is the calendar for charitable food 14 service events on the health department's web page, 15 right? 16 A. Yes. 17 Q. And it lists some of the individuals and groups 18 providing food at 61 Riesner? 19 A. Yes. 20 Q. Okay. Now, on this first page -- and so do you 21 see on the top where it says January 2025? 22 A. Yes. 23 Q. Okay. So it appears that someone named 24 Elizabeth Tannery scheduled a charitable feeding at 25 Riesner on January 1st, 2025?</p>

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REPORTER'S CERTIFICATION
ORAL DEPOSITION OF
RENEE BECKHAM
TAKEN FEBRUARY 13, 2025

I, DONNA QUALLS, Shorthand Reporter and Notary
Public in and for the State of Texas, Notary ID
No. 12161359, hereby certify to the following:

That the witness, RENEE BECKHAM, was duly
sworn by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the original deposition was delivered to
RANDALL HIROSHIGE;

That a copy of this certificate was served on
all parties and/or the witness shown herein on

_____.

I further certify that pursuant to FRCP No.
30(f)(i) that the signature of the deponent was
requested by the deponent or a party before the
completion of the deposition and that the signature is
to be returned within 30 days from date of receipt of
the transcript. If returned, the attached Changes and
Signature Page contains any changes and the reasons
therefor.

I further certify that I am neither counsel

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1 for, related to, nor employed by any of the parties in
2 the action in which this proceeding was taken, and
3 further that I am not financially or otherwise
4 interested in the outcome of the action.

5 Certified to by me this 28th day of February,
6 2025.

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10 DONNA QUALLS
11 Notary Public in and for
12 The State of Texas, Notary ID 12161359
13 My Commission expires 11/06/2026

14 Magna Legal Services
15 Firm Registration No. 633
16 16414 San Pedro, Suite 900
17 San Antonio, Texas 78232
18 (210) 697-3400
19
20
21
22
23
24
25